

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO.
	§	
\$14,914.00 IN U.S. CURRENCY,	§	
Defendant	§	

VERIFIED COMPLAINT FOR FORFEITURE IN REM

United States of America, Plaintiff, files this action for forfeiture against approximately \$14,914.00 in United States currency, Defendant in rem, and alleges as follows in accordance with Rule G(2) of the Supplemental Rules For Admiralty or Maritime Claims and Asset Forfeiture Actions:

*Nature of the Action*

1. This is an action to forfeit property to the United States pursuant to 31 U.S.C. §5317(c)(2).

*Defendant in Rem*

2. Defendant in rem is approximately \$14,914.00 in United States currency that was seized at the George Bush Intercontinental Airport in Houston, Texas, from Rajagopala Pillai and Kamala Pillai on February 13, 2010.

*Jurisdiction and Venue*

3. This Court has jurisdiction under 28 U.S.C. §1355 because this is an action for forfeiture.

4. Venue is proper in this Court under 28 U.S.C. §§ 1355 and 1395(a) and (b) because the acts or omissions giving rise to the forfeiture occurred in the Southern District of Texas, the property was found and is located in the Southern District of Texas, and this forfeiture action accrued in the Southern District of Texas.

*Basis for Forfeiture*

5. The Defendant in rem is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2) which provides that any property involved in violations of 31 U.S.C. §§ 5316 and 5324(c) may be forfeited to the United States. Under 31 U.S.C. § 5316(a)(1)(A), a person shall file a report when the person knowingly transports, is about to transport, or has transported a monetary instrument of more than \$10,000 out of the United States. Under 31 U.S.C. § 5324(c)(2) no person shall, for the purpose of evading the reporting requirements of section 5316, file a report required by section 5316, or cause or attempt to cause a person to file such a report that contains a material omission or misstatement of fact. United States currency is a monetary instrument under 31 U.S.C. §5312(a)(3)(A).

*Facts*

6. On February 13, 2010, Rajagopala Pillai, husband, and Kamala Pillai, wife, were about to leave the United States aboard Air France flight number 639, destined for Paris, France, with India as their final destination, at the George Bush Intercontinental Airport in Houston, Texas. On the jetway, a United States Customs and Border Protection Officer (CBP Officer) conducted a Customs outbound inspection. The CBP Officer asked Mr. Pillai if he and his wife were transporting more than \$10,000 in cash or monetary instruments for themselves or others. Mr. Pillai stated verbally and in writing that they were carrying only \$7,000.

7. As part of a currency verification procedure, CBP Officers asked Mr. and Mrs. Pillai to place all of their money on an inspection table. A CBP Officer also inspected Mrs. Pillai's purse. The CBP Officers found that Mr. and Mrs. Pillai were transporting approximately \$14,914.00 on their person and in her purse. These funds were seized by CBP Officials.

*Relief Requested*

8. Plaintiff requests

a. an arrest warrant and summons, citing all persons having an interest in the Defendant property to appear on the return day of

process by filing a claim and answer pursuant to Rule G(5),  
Supplemental Rules for Admiralty or Maritime Claims and Asset  
Forfeiture Actions, or as ordered by this Court,

b. a judgment of forfeiture, and

c. costs and other relief to which the Plaintiff may be entitled.

Dated: March 23, 2010.

Respectfully submitted,

José Angel Moreno  
United States Attorney

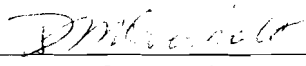
By: /s/ Albert Ratliff  
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VERIFICATION

I, Deanna Overholt, Senior Special Agent, United States Immigration and  
Customs Enforcement, declare under penalty of perjury as provided by 28 U.S.C.  
§1746 that I have read this Verified Complaint for Forfeiture in Rem, and the facts  
stated in this complaint are true and correct to the best of my knowledge and

belief.

Executed on March 23, 2010.

  
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Deanna Overholt, Senior Special Agent  
U. S. Immigration and Customs Enforcement